NASA Plan

For Reviewing and Reducing

Personally Identifiable Information (PII) and

Eliminating Unnecessary Use of

Social Security Numbers (SSNs)

ITS-Plan
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2	V1.1	Entered P. Stockman's Markups	Aug 20, 2007
3	V1.2	Revision After P. Stockman's Review	Aug 23, 2007
4	V1.3	Revisions after P. Stockman's Final Reviews	Aug 24, 2007
5	V1.4	Revisions after P. Stockman's Final Reviews	Aug 31, 2007
6	V1.5	Revisions by P. Stockman	Sept 2, 2007
7	V1.6	Revision with changes requested by P. Stockman e-mail	Sept 19, 2007
8	V1.7	Revision - PII master list functional category percentage	Sept 24, 2007
9	V1.8	Final Staff Markups	Dec 17, 2007

NASA Plan For Reviewing and Reducing Personally Identifiable Information (PII) and Eliminating Unnecessary Use of Social Security Numbers (SSNs)

1. Purpose

This NASA plan provides for ongoing identification, review, and reduction of NASA holdings of Personally Identifiable Information (PII) as defined in NPR 1382.1to assure that only the minimum PII holdings needed for NASA operations and administration are retained. Implementation of the plan will assure that PII collected and maintained by NASA is only that which is relevant and necessary to accomplish a purpose of the Agency, as required by statute or Executive Order of the President and specified in NPR 1382.1. This document also includes NASA's plan for eliminating unnecessary use of Social Security Numbers (SSNs).

In addition to meeting the OMB requirements, NASA's objective is to reduce the risk to the Agency as a whole as well as NASA personnel and the members of the public who interact with the Agency. The reduced PII holdings and elimination of SSNs where not mandatory will help minimize the risk of a PII breach and its potential harm to individuals, such as identity theft. The PII holdings review requirement is not limited to IT systems but includes PII holdings such as electronic records on removable storage media and individual workstations or in hard copy or microfilm files.

2. Applicability

This plan is applicable to NASA Headquarters and Centers, including Component Facilities and Technical and Service Support Centers. To the extent specified in their respective contracts or agreements, it applies to the NASA Jet Propulsion Laboratory, other contractors, grant recipients, or parties to agreements, to the extent that they maintain PII, including SSNs, on NASA's behalf.

3. References

a. OMB M-07-19, FY 2007 Reporting Instructions for the Federal Information Security Management Act and Agency Privacy Policy

b. NPD 1382.17 NASA Privacy Policy

c. NPR 1382.1, NASA Privacy Procedural Requirements

4. Requirements

a. (1) Review all current PII holdings and ensure such holdings are accurate, relevant, timely, and complete, and (2) reducing them to the minimum necessary for the proper performance of the documented NASA function.

b. Provide progress updates of the PII review and reduction for an annual NASA PII reduction report the NASA Chief Information Officer (CIO) will submit to OMB and make publicly available.

c. Implement the schedule included in this plan for updating the review of the NASA PII holdings.

5. Roles

a. The NASA CIO shall ensure the development and publication of the NASA plan and schedule for reviewing and reducing Agency-held PII, eliminating unnecessary use of SSNs.

b. The NASA Privacy Act Officer is responsible for:

- Developing PII Review and Reduction Standard Operating Procedures (SOP) for conducting reviews, providing the implementation processes, and procedures.

- Keeping the SOP up to date.

- Ensuring Agency completion of the annual review and analysis by April 30 each year.

c. Center and Mission Directorate CIOs, through the Center Privacy Act Managers (PAMs), are responsible for implementing this plan.

d. The Center PAMs are responsible for:

- During the second quarter of each fiscal year, coordinating the annual PII review at their Centers, in accordance with the PII Review and Reduction SOP.

- By March 31 each year, providing PII review results to the NASA Privacy Act Officer.

e. The owners of systems, applications, or other data holdings will conduct the PII review and reduction analysis in accordance with the PII Review and Reduction SOP and Center PAM direction.

6. Plan and Schedule for Review and Reduction of PII

NASA conducted a survey of the Agency in 2006 to identify all holdings of PII, thus establishing an initial baseline inventory of NASA systems and applications containing PII. During 2007, the Agency refined and revalidated the inventory, identifying opportunities and plans for reducing holdings. The summary of the 2007 review showing the breakdown in percentages of reported holdings by functional area is shown below in Table 6.1.

Functional Category	Percentage of Holding
Medical	24%

Functional Category	Percentage of Holding
Human Capital Mgt/Personnel	33%
Financial Management	3%
Public Affairs Office	5%
Security	9%
Equal Opportunity Office	5%
Training/Education	9%
Administration, Including Legal, Travel, IG, and Acquisition	13%

Table 6.1 NASA Function Categories with Percentage PII holdings

In FY 2008, NASA expects to further reduce the PII holdings using its annual review process as identified in this plan.

The remainder of this section sets forth NASA's plan for ongoing annual reviews to further validate PII holdings and reductions.

a.   By January 15 of each year, the Center PAM will task PII system owners to conduct PII review and reduction analyses by the report due date following the PII Review and Reduction SOP. These procedures will be detailed in the PII Review and Reduction SOP which will elaborate steps for the annual review and data elements to be reported.

b. PII Owners/Holders will respond by completing the annual holdings review providing their results to the Center PAM per Center PAM schedule/data call.

c. By March 31 each year, Center PAMs will submit the Center reports to the NASA Privacy Act Officer.

d. By April 30 each year, the NASA Privacy Act Officer will review each Center's report, compiling the Agency report by July 1.

7. Plan and Schedule for Eliminating Unnecessary Use of SSNs

a.   It is NASA's objective to maximize the protection of SSNs when their use is required and eliminate their use when they are not necessary. It is for this reason that NPD 1382.17 specifies that SSNs not be used unless mandated by external requirements. The NPD further requires that system owners whose systems contain SSNs work with the Office of the CIO to develop a plan for switching to other Agency-specific identifiers. The Agency is required to convert from use of SSNs in NASA administration and operations to use of NASA's Universal Uniform Personal Identification Code (UUPIC).

This section describes the implementation process of eliminating the unnecessary use of SSNs at the National Aeronautics and Space Administration (NASA).

b. <u>FY2007 Accomplishments</u>. The NASA OCIO recognizes the national increase in incidents involving Government-held PII, which includes SSNs. Due to this recognition, the NASA OCIO initiated an effort in May 2007 to build upon Agency data gathered in response to OMB's December 5, 2006, action to survey Agency processes utilizing SSNs. The May activity required NASA organizations to review their holdings of SSNs with the objective of eliminating their unnecessary use.

The NASA OCIO recognizes the national increase in incidents involving Government-held PII, which includes SSNs. Due to this recognition, the NASA CIO initiated an effort in May 2007 for System Owners to survey NASA processes that use SSNs.

System owners were required to:

   (1) Justify their use of SSNs

   (2) Provide a date when SSNs in the system would be converted to the NASA UUPIC, or

   (3) Provide a date when the system would be decommissioned.

The results of the review are summarized in Table 6.2. The review identified 39 Agency applications containing SSNs. Of the 39, 22 provided justification for using SSNs rather than Agency UUPICs, however, it is expected that 16 of these will be able to convert SSNs to the Government-wide Unique Employee Identifiers (UEIDs) and the new medical records numbers when they are developed and available. NASA personnel are, in fact, participating in the Office of Personnel Management (OPM)-led team to develop this Government-wide alternative, contributing NASA experience with development of our Agency UUPIC.

Owners of four NASA applications using SSNs provided dates by when conversion to UUPIC will be completed and eight provided dates by when their applications will be decommissioned. In addition to the information requested, the review identified five applications as candidates for consolidation with other applications.

	SSN Justification	Planned UUPIC Conversion	Planned Decommissioning	Consolidated
# Applications	22	4	8	5

Table 6.2
Review of NASA SSN Holdings

c. <u>Schedule</u>. The information provided by the 2007 review has enabled NASA to set solid goals for unnecessary elimination of systems containing SSNs.

September 2008	• Complete conversions from SSNs to UUPICs in four systems • Decommission seven systems • Consolidate five systems
December 2009	• Decommission one system

Decommissioning of the eighth candidate system identified for elimination cannot be decommissioned until December 2009, due to HSPD-12 dependencies.

d. <u>Securing Necessary SSNs</u>. NASA will pursue additional security measures to protect holdings of SSNs it is not able to eliminate due to justifiable requirements for SSN use.

(1) Several systems will be consolidated with Agency systems located at a NASA data center at Marshall Space Flight Center (MSFC). While all NASA systems are Certified and Accredited, MSFC's data center provides added layers of security for the protection of PII through the use of multiple firewalls, multiple intrusion detection systems, proxied remote access, and strict procedures for access.

(2) By March 31, 2008, owners of applications with justification for maintaining SSNs will identify actions they have already taken or will take to provide additional protection of data. Such actions will include suppressing visibility of SSNs for any application user other than those whose jobs require that they see the identifiers and masking SSNs where visible.

Approved by:

Signature on File   Signed: 12/21/07

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Jonathan Q. Pettus   Date
Chief Information Officer and Senior Agency Official for Privacy